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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,

Case No. CR 19-419 SI

13 Plaintiff,

14 v.  
15 JOHN LEE,  
16  
17 Defendant.

DECLARATION OF LATANYA  
HOOPER

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19 I, Latanya Hooper, state as follows:

- 20  
21 1. On April 13, 2020 at 6:33pm, I spoke with Michael Portman, an Investigator with the Federal  
22 Public Defender Office in San Francisco, California. He reached me at my cell phone: (415) 571-  
23 0968. I confirmed that I currently live at 7920 Tamoshanter Drive, Apt. 317, Stockton, CA  
95210.  
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25 2. I live at 7920 Tamoshanter Drive, Apt. 317, along with John Lee Jr., my son with John Lee (the  
defendant in this case).  
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27 3. John Lee Sr. and I have been partners for 25 years. We share a 12 year-old son, John Jr. John Jr.  
28 is currently enrolled in on-line school due to the COVID 19 situation.

- 1       4. I collect Social Security and SSI, as well as CalWORKs for John Jr. I earn additional income by
- 2                 watching my grandkids while my daughter works fulltime as an in-home care nurse.
- 3       5. I receive Medi-Cal for health care related issues. If BOP health insurance did not cover John Sr.,
- 4                 he could apply for alternative public options as he has in the past. Should he need future
- 5                 medical care, he can be seen at the local Sutter Medical Center in Stockton.
- 6       6. As long as I have known John, he has smoked cigarettes. My estimate is that (prior to lock up)
- 7                 he smoked two packs a day. I tried to get John to quit smoking cigarettes, but am so far
- 8                 unsuccessful. He has also tried himself, unsuccessfully.
- 9       7. I met John over 25 years ago. The entire time I've known him, he has used an inhaler for asthma
- 10                 related to medical issues. His asthma attacks come on at random times; he often has asthma
- 11                 attacks when he walks up stairs or hills. When I asked his family about it, they (individually)
- 12                 expressed concern about the severity of his asthma, especially because he was such a strong
- 13                 athlete at one point and his asthma was curtailed in that progress. According to them, he was
- 14                 hospitalized in high school because his asthma was so severe.
- 15       8. If John were to be released from Santa Rita Jail, I would welcome him back into my home. He
- 16                 would be able to shelter-in-place here, and all of his basic needs would be met.
- 17       9. Thankfully, my home does not have stairs. I am militant about making John carry his inhaler
- 18                 with him (should he have an attack). Though this may annoy him, it will keep him safe. His
- 19                 safety & health is my #1 priority.
- 20       10. As his partner, I am reminded of his lung condition every morning, as he coughs repeatedly (like
- 21                 a "smoker's cough") every morning when he awakes.
- 22       11. I am aware of positive COVID 19 cases at Santa Rita Jail and am extremely concerned for
- 23                 John's health. Should he contract the virus, I am especially worried that his underlying asthma
- 24                 will make him susceptible to severe lung issues.
- 25       12. I know John made mistakes, but I believe he is a good man at heart. I know his love for me and
- 26                 our son will always win out in the end.

1 I DECLARE under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge.

3 Signed and dated on the 10th day of May, 2020, in Stockton, California.

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6 LATANYA HOOPER  
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